

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JOHN DOE,

Plaintiff,

V.

MICHIGAN STATE UNIVERSITY,
MICHIGAN STATE UNIVERSITY BOARD
OF TRUSTEES; JOHN ENGLER, individually and
as agent for Michigan State University, KROLL
ASSOCIATES, INC., as agent for Michigan State
University, MARK EHLERS, individually and as
agent for Michigan State University, KENDRA
WALDSMITH, individually and as agent for
Michigan State University, ANDE DUROJAIYE,
individually and as agent for Michigan State
University, RICK SHAFER, individually and as
agent for Michigan State University, and DENISE
MAYBANK, individually and as agent for
Michigan State University,

Defendants.

**DEFENDANTS' JOINT UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE RESPONSIVE PLEADING**

Pursuant to Section IV(A)(1)(d) of the Court's Civil Practice Guidelines, Defendants jointly request an extension of time in which to respond to Plaintiff's Amended Complaint. As explained in their Pre-Motion Conference Requests, which were filed earlier today, Defendants intend to move to dismiss the Amended Complaint in its entirety. Because Defendants cannot file their motion to dismiss until the Court has held a pre-motion conference, *see* Civil Practice Guidelines § IV(A)(1)(a), Defendants request that the Court extend the deadline for filing their responsive pleading until whatever date the Court sets for the filing of Defendants' motions to dismiss. Counsel for Plaintiff consents to the requested extension.

Respectfully submitted,

Dated: July 19, 2019

s/ Michael E. Baughman

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/s/ Stephen V. D'Amore

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*Kroll Associates, Inc., Mark Ehlers, and
Kendra Waldsmith*

CERTIFICATE OF SERVICE

I certify that on July 19, 2019, pursuant to Local Rule 5.7, I filed the foregoing Defendants' Joint Unopposed Motion for Extension of Time to File Responsive Pleading through the Court's Electronic Case Filing (ECF) system.

s/ Michael E. Baughman

Michael E. Baughman, Esq.